

1 **GERALD M. COBB (SBN: 44702)**  
2 **16633 Ventura Boulevard**  
3 **Suite 500**  
4 **Encino, California 91436**  
5 **(818) 990-9710**

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7  
8 Attorney for Defendant  
9 **MARCUS RANDALL**

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11 **IN THE UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

13 **UNITED STATES OF AMERICA,**

14 Plaintiff,

15 vs.

16 **MARCUS RANDALL,**

17 Defendant

CASE NO.: **1:21-CR-00129-JLT-SKO**

**STIPULATION TO CONTINUE  
SENTENCING AND ORDER  
THEREON**

DATE : **October 16, 2023**

TIME : **10:00 a.m.**

COURT: **Hon. Jennifer L. Thurston**

18  
19 **STIPULATION**

20 Plaintiff UNITED STATES OF AMERICA, by and through its counsel KATRINA  
21 BROWNSON, and defendant, by and through defendant's counsel of record GERALD M.  
22 COBB, hereby stipulate as follows:

23 1. By previous order, this matter was set for sentencing on October 16, 2023 at 10:00  
24 a.m..

25 2. By this stipulation, defendant now moves to continue the sentencing until  
26 December 11, 2023 at 10:00 a.m.

27 3. The parties agree and stipulate, and request that the Court find the following:

28 a) Counsel for defendant desires additional time after consulting with his client at

1 Lerdo Pre-trial Facility in Bakersfield on October 2, 2023 about particular factual  
2 contentions and conclusions to be drawn therefrom which were contained in the  
3 government's sentencing memorandum filed July 31, 2023. After jointly reviewing and  
4 discussing some of the government's exhibits which were made part of it's sentencing  
5 memorandum, defense counsel believes that a more extensive review of parts of the  
6 voluminous discovery previously provided by the government is required in order to  
7 properly prepare and address issues relevant to the court's sentencing determination.

8 b) Counsel for defendant still needs additional time to receive and properly present to  
9 U.S. Probation Officer JESSE MORA letters written on behalf of the defendant.

10 c) Counsel for defendant believes that failure to grant the above-requested  
11 continuance would deny him the reasonable time necessary for effective preparation for  
12 sentencing.

13 d) The government does not object to the continuance.

14 e) Based on the above-stated findings, the ends of justice served by continuing the  
15 case as requested. Defense counsel to file sentencing memorandum by December 4, 2023.

16 IT IS SO STIPULATED.  
17

18 DATED: October 6, 2023

PHILLIP A. TALBERT  
United States Attorney

19  
20 *Antonio Pataca*

21 ANTONIO PATACA  
Assistant United States Attorney

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23  
24 DATED: October 6, 2023

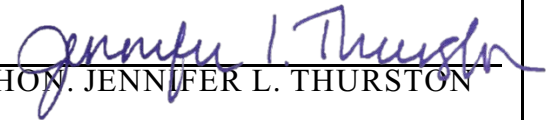
*Gerald M. Cobb*

25 GERALD COBB  
Counsel for Defendant  
26 MARCUS RANDALL  
27  
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**ORDER**

IT IS SO ORDERED

DATED: October 11, 2023

  
HON. JENNIFER L. THURSTON